

**UNITE HERE Fund Administrators**

An Affiliate of Amalgamated Life

June 26, 2008

UNITE HERE Fund Administrators, Inc.

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**VIA FACSIMILE (212) 805-7928**

Honorable Michael H. Dolinger  
 United States District Court  
 Southern District of New York  
 United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

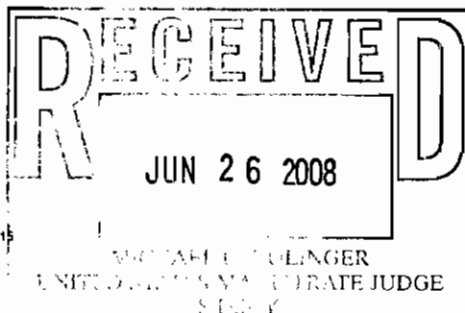
Re: Trustees of the UNITE HERE National Health Fund, et al.  
 - v. - Bag Specialist, Inc. - 07 Civ. 6188 (RMB)

Dear Judge Dolinger:

We represent the plaintiffs in the above-referenced action to collect delinquent contributions pursuant to Section 515 of ERISA. We are writing to request a brief extension to July 3, 2008 of the June 26, 2008 deadline for submission of an additional declaration in support of plaintiffs' application for damages. We find it necessary to make this request for the following reasons.

On June 1, 2008 the Court issued its Order directing plaintiffs to submit a declaration by an individual with personal knowledge explaining in detail the method of calculating damages, interest, liquidated damages and costs in this action. On June 6, 2008, the Court issued its Order directing submission of the declaration by June 13, 2008. At plaintiffs' request, the Court permitted an extension to June 26, 2008 for submission of the additional declaration and directed "no further delays should be expected."

Plaintiffs' supervisor auditor has personal knowledge of the data and calculations underlying the instant application and will be the individual submitting the supplemental declaration. He was out-of-town on a previously scheduled trip during the period June 16 - 20, 2008. Plaintiffs' counsel had anticipated completion of the supplemental declaration this week, and the supervisor auditor has worked diligently to review the data and calculations after his return to the office on June 23, but will require additional time to complete his analysis. Unfortunately and regrettably, during the same time period, a key managerial staff member on plaintiffs' counsel's team was absent on an extended sick leave. As a result, plaintiffs' counsel has been unable to work with the audit supervisor to draft his declaration in the proper format for submission to the Court.



*ENDORSED ORDER*  
 No further extensions will be granted. If plaintiff cannot submit a proper application by July 3, 2008, we will severely consider denial of relief.

*6/26/08*

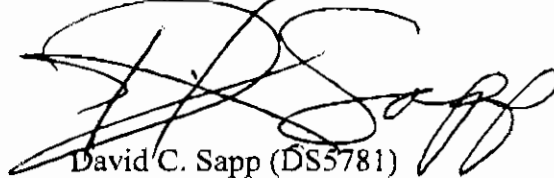
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Given the foregoing, plaintiffs respectfully request the Court's permission for an extension of time to July 3, 2008 for submission of the additional declaration in support of plaintiffs' application for damages.

Plaintiffs and the undersigned counsel sincerely apologize to the Court for any inconvenience caused to the Court by the requested extension.

The Court's considerations will be greatly appreciated.

Respectfully submitted,



David C. Sapp (DS5781)

cc: Bag Specialist, Inc.